

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
v.) CRIMINAL NO. 21-cr-10157-MLW
)
MANISH KUMAR,)
Defendant.)
)

**DEFENDANT’S MOTION FOR RELEASE FROM CUSTODY AND REQUEST
FOR DETENTION HEARING**

Now comes Manish Kumar, pursuant to 18 U.S.C. § 3142, and hereby moves this Honorable Court to release him from custody. He requests a detention hearing for the purpose of determining appropriate conditions of release. As reasons therefor he states the following:

1. Mr. Kumar was arrested on May 13, 2021, and arraigned in the above-captioned matter on June 24, 2021.
2. At the time of his arrest, Mr. Kumar was in immigration detention in Michigan, having just completed a federal prison sentence from the District of Rhode Island stemming from the investigation that also led to the above-captioned matter (See United States v. Manish Kumar, 20-cr-00089-JJM-PAS)
3. On his arraignment date in this Court, he consented to a voluntary order of detention without prejudice. Magistrate Judge Kelley ordered that he may seek a full detention hearing and the setting of conditions of release, “regardless of whether there have been changed circumstances.” (ECF Doc. 14).
4. Mr. Kumar’s girlfriend is now able to assist him financially so that he can secure an apartment. His girlfriend and defense counsel are able to assist Mr. Kumar in locating a suitable apartment in the Boston area. Because he will need to sign a lease, Mr. Kumar cannot reasonably move forward

with renting an apartment until he knows that the court will consider releasing him from custody.

5. Mr. Kumar now seeks to have a detention hearing, so that he may seek his release.

Respectfully submitted,
MANISH KUMAR,
By his attorney,

Date: June 30, 2022

/s/ Henry Fasoldt
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 30, 2022.

/s/ Henry Fasoldt
Henry Fasoldt